

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VALLEY HEALTH SYSTEM, LLC, a Delaware
Limited Liability company, DVH HOSPITAL
ALLIANCE, LLC, a Delaware Limited Liability
company, and SUMMERLIN HOSPITAL
MEDICAL CENTER, LLC, a Delaware Limited
Liability company,

Plaintiffs,

vs.

TRAVEL INSURANCE FACILITIES, PLC, a
Foreign Corporation, UNION
REISEVERSICHERUNG
AKTIENGESELLSCHAFT, a Foreign
Corporation,

Defendants.

CASE NO.: 2:22-CV-00365-ART-DJA

**ORDER APPROVING
STIPULATION TO EXTEND TIME
FOR PLAINTIFFS TO FILE
RESPONSE TO DEFENDANT UNION
REISEVERSICHERUNG
AKTIENGESELLSCHAFT'S
MOTION TO DISMISS OR, IN THE
ALTERNATIVE, FOR A MORE
DEFINITE STATEMENT**

[SECOND REQUEST]

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs VALLEY HEALTH SYSTEM, LLC; DVH HOSPITAL ALLIANCE, LLC, and SUMMERLIN HOSPITAL MEDICAL CENTER, LLC (collectively, “Plaintiffs”) by and through their counsel of record, Timothy M. Hartley, Esq. (admitted *pro hac vice*) of the Hartley Law Offices and Jason M. Wiley, Esq. of the law firm Wiley Petersen and Defendant UNION REISERVERSICHERUNG AKTIENGESELLSCHAFT (“URV”) by and through its counsel of record, Pat Lundvall, Esq. and Daniel Aquino, Esq. of the law firm McDonald Carano to extend the time for Plaintiffs to file a response to *Defendant Union Reiseversicherung Aktiengesellschaft’s Motion to Dismiss or, in the Alternative, For a More Definite Statement* (“Motion”). ECF No. 24. The Motion was filed on June 30, 2022, and no hearing date has been scheduled. The parties respectfully request the Court enter an order extending Plaintiffs’ response to the Motion to August 12, 2022.

The parties offer the following reasons for the requested extension:

1. On June 30, 2022, URV filed its Motion.
2. In order to fully and adequately respond to URV’s Motion, Plaintiffs filed their *Motion for Leave to Conduct Limited Jurisdictional Discovery* (“Jurisdictional Discovery Motion”). ECF No. 25. On July 15, 2022, the Court denied the Jurisdictional Discovery Motion without prejudice, pending satisfaction of the meet and confer requirement under Local Rule IA 1-3(f). ECF No. 27.
3. Defendant TRAVEL INSURANCE FACILITIES, PLC (“TIF”), has yet to be served with the Summons and Complaint through international service procedures pursuant to Fed.R.Civ.P. 4.
4. It is anticipated that, once service does occur, TIF will assert similar argument as advanced by URV in its Motion.
5. During the extension period, the parties will utilize the time to (a) determine whether TIF has been served; (b) discuss how the Jurisdictional Discovery Motion to be refiled by Plaintiffs affects the Motion; and (c) formulate a plan regarding the Motion, Jurisdictional Discovery Motion, and other related matters.
6. Subsequent to the filing the *Stipulation and Order to Extend Time for Plaintiffs to File*

Response to Defendant Union Reiseversicherung Aktiengesellschaft's Motion to Dismiss or, in the Alternative, For a More Definite Statement [First Request] ("First Request") [ECF No. 26], the parties have engaged in preliminary settlement discussions and have tentatively agreed to meet to discuss resolution of all claims and causes of action alleged.

7. The Court granted the First Request [ECF No. 28] setting July 22, 2022, as Plaintiffs' response date to the Motion.
8. It is anticipated that the parties will conduct a meeting/conference prior to the requested extension deadline date of August 12, 2022, in addition to undertaking the tasks set forth in Paragraph 5 *supra*.
9. The requested extension will not unduly prejudice any party to the litigation.
10. The stipulation is made in good faith, not for purposes of delay, and will not cause undue harassment or delay.

DATED this 21st day of July, 2022

MCDONALD CARANO

/s/ Daniel Aquino
PAT LUNDVALL, ESQ.
Nevada Bar No. 3761
DANIEL AQUINO
Nevada Bar No. 12682
2300 West Sahara Avenue
Suite 1200
Las Vegas, Nevada 89102
Telephone: 702.873.4100

Attorneys for Defendant URV

DATED this 21st day of July, 2022


WILEY PETERSEN

/s/ Jason Wiley
JASON M. WILEY, ESQ.
Nevada Bar No. 9274
E. DANIEL KIDD, ESQ.
Nevada Bar No. 10106
1050 Indigo Drive
Suite 200-B
Las Vegas, Nevada 89145
Telephone: 702.910.3329

Attorneys for Plaintiffs

IT IS SO ORDERED:

DATED: July 25, 2022.


Anne R. Traum
UNITED STATES DISTRICT JUDGE